



ATOFINA Chemicals, Inc.

April 18, 2002

The Honorable David Garman
Assistant Secretary for Energy Efficiency
and Renewable Energy
1000 Independence Avenue, SW
Room 6C-016
Washington, DC 20585

Dear Assistant Secretary Garman:

Again, I would like to thank you for the close attention you are giving the Energy Star Windows program at the Department of Energy. I would also like to take this opportunity to address comments recently submitted by Mr. Ken Nittler of Enercomp, Inc.

Mr. Nittler discusses a method being developed by Pacific Gas and Electric Company which assigns a time dependent value (TDV) to electricity consumption in California. By this method, energy usage during peak consumption hours are valued more than energy usage during off-peak hours. Mr. Nittler attempts to use this method to justify reducing the required solar heat gain coefficient for windows in the upper central region (3500-6000 heating degree days). This is misleading, in that the method developed by PG&E includes electricity consumption from all sources such as lighting, HVAC, and appliances – Mr. Nittler makes no clear connection between the overall peak energy consumption and any contribution related to solar heat gain of residential windows. I would like to reiterate that the Barbour & Arasteh analysis shows the potential savings of windows to the total U.S. peak load to be incredibly small (less than 0.024%). Furthermore, Mr. Nittler's example of Fresno is for a cooling-dominated city at 2560 heating degree days, which is irrelevant to the area under discussion (3500-6000 HDD), and it is highly speculative to apply a conclusion from California's unique climate to the rest of the country. Finally, Mr. Nittler again does not address the increase in energy consumption during the heating season as a result of lower solar heat gain, and the resulting total fuel consumption for the entire year (both electricity and hydrocarbon).

I hope these comments are helpful in your deliberations, and I look forward to the continued growth of the Energy Star for Windows program.

Sincerely,

Thomas Culp, Ph.D.

cc: Richard Karney